

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN SECTION OF TENNESSEE  
WESTERN DIVISION

---

SCOTT TURNAGE , CORTEZ D. BROWN,	)	
DEONTAE TATE, JEREMY S. MELTON, ESTATE OF	)	<b>Case No. 2:16-cv-2907-</b>
ISSACCA POWELL, KEITH BURGESS, TRAVIS	)	<b>SHM/tmp</b>
BOYD, TERRENCE DRAIN, and KIMBERLY ALLEN	)	
on behalf of themselves and all similarly situated	)	
persons,	)	
 PLAINTIFFS,	)	<b>CLASS ACTION</b>
 v.	)	<b>COMPLAINT FOR</b>
	)	<b>VIOLATIONS OF THE</b>
	)	<b>CIVIL RIGHTS ACT OF</b>
	)	<b>1871, 42 U.S.C. § 1983,</b>
	)	<b>TENNESSEE COMMON</b>
	)	<b>LAW, DECLARATORY, AND</b>
	)	<b>INJUNCTIVE RELIEF</b>
 BILL OLDHAM, in his individual capacity as former	)	
Sheriff of Shelby County, Tennessee; FLOYD	)	<b>JURY TRIAL DEMANDED</b>
BONNER, JR., in his official capacity as Sheriff of	)	<b>PURSUANT TO FED. R.</b>
Shelby County, Tennessee; ROBERT MOORE, in his	)	<b>CIV. PRO. 38(a) &amp; (b)</b>
individual capacity as former Jail Director of Shelby	)	
County, Tennessee; KIRK FIELDS, in his official	)	
capacity as Jail Director of Shelby County, Tennessee;	)	
CHARLENE McGHEE, in her individual capacity as	)	
former Assistant Chief of Jail Security of Shelby County,	)	
Tennessee; REGINALD HUBBARD, in his official	)	
capacity as Assistant Chief of Jail Security of Shelby	)	
County, Tennessee; DEBRA HAMMONS, in her	)	
individual capacity as former Assistant Chief of Jail	)	
Programs of Shelby County, Tennessee; TIFFANY	)	
WARD in her official capacity as Assistant Chief of Jail	)	
Programs of Shelby County, Tennessee; SHELBY	)	
COUNTY, TENNESSEE, a Tennessee municipality;	)	
TYLER TECHNOLOGIES, INC., a foreign corporation;	)	
GLOBAL TEL*LINK CORPORATION, a foreign	)	
corporation; SOFTWARE AG USA, INC., a foreign	)	
corporation; and SIERRA-CEDAR, INC., a foreign	)	
corporation, SIERRA SYSTEMS GROUP, INC., a	)	
foreign corporation.	)	
 DEFENDANTS.	)	

---

---

**NOTICE OF APPEARANCE – CRAIG A. EDGINGTON**

---

COME NOW **CRAIG A. EDGINGTON** and the law firm of Donati Law, PLLC, and give notice of their appearance for Plaintiffs, Scott Turnage, Cortez D. Brown, Deontae Tate, Jeremy S. Melton, the Estate of Issacca Powell, Keith Burgess, Travis Boyd, Terrence Drain, and Kimberly Allen, in this cause.

Respectfully submitted,

/s/Craig A. Edgington  
Craig A. Edgington (#38025)  
Donati Law, PLLC  
1545 Union Ave.  
Memphis, TN 38104  
(901) 278-1004, Ext 239 - Phone  
(901) 278-3111 - Facsimile  
[craig@donatilaw.com](mailto:craig@donatilaw.com)

**CERTIFICATE OF SERVICE**

I hereby certify that on this 16<sup>th</sup> day of November, 2020, the foregoing was electronically filed with the Clerk of the Court using the CM/ECF system which will send a notice of electronic filing to the following:

Robert E. Craddock, Esq.  
Odell Horton, Jr., Esq.  
Amber D. Floyd, Esq.  
WYATT, TARRANT & COMBS, LLP  
1715 Aaron Brenner Drive, Suite 800  
Memphis, Tennessee 38120  
(901) 537-1000  
[rcraddock@wyattfirm.com](mailto:rcraddock@wyattfirm.com)  
[ohorton@wyattfirm.com](mailto:ohorton@wyattfirm.com)  
[afloyd@wyattfirm.com](mailto:afloyd@wyattfirm.com)  
*Counsel for Defendants Bill Oldham,  
Robert Moore, Charlene McGhee,  
Debra Hammons, and Shelby County, Tennessee*

Emmett Lee Whitwell, Esq.  
SHELBY COUNTY ATTORNEY'S OFFICE  
160 N. Main Street, Ste 950  
Memphis, Tennessee 38103  
(901) 222-2100  
[Lee.whitwell@shelbycountyttn.gov](mailto:Lee.whitwell@shelbycountyttn.gov)  
*Counsel for Defendants Bill Oldham,  
Robert Moore, Charlene McGhee,  
Debra Hammons, and Shelby County, Tennessee*

Bradley E. Trammell, Esq.  
BAKER, DONELSON, BEARMAN,  
CALDWELL & BERKOWITZ, P.C.  
165 Madison Avenue, Suite 2000  
Memphis, Tennessee 38103  
(901) 577-2121  
[btrammell@bakerdonelson.com](mailto:btrammell@bakerdonelson.com)  
*Counsel for Tyler Technologies, Inc.*

Beth Bivans Petronio, Esq.  
K & L GATES, LLP  
1717 Main Street, Suite 2800  
Dallas, Texas 75201  
(214) 939-5815  
[Beth.petronio@klgates.com](mailto:Beth.petronio@klgates.com)  
*Counsel for Tyler Technologies, Inc.*

Russell B. Bundren, Esq.  
James L. Murphy, Esq.  
BRADLEY ARANT OULT CUMMINGS, LLP  
1600 Division Street, Suite 700  
Nashville, Tennessee 37210  
[bbundren@babco.com](mailto:bbundren@babco.com)  
[jmurphy@bradley.com](mailto:jmurphy@bradley.com)  
*Counsel for Defendant Global Tel\*Link  
Corporation*

Douglas F. Halijan, Esq.  
William D. Irvine, Esq.  
BURCH PORTER & JOHNSON, PLLC  
130 N. Court Avenue  
Memphis, Tennessee 38103  
(901)-524-5000  
[dhalijan@bpjlaw.com](mailto:dhalijan@bpjlaw.com)  
[wirvine@bpjlaw.com](mailto:wirvine@bpjlaw.com)  
*Counsel for Defendant, Software AG USA, Inc.*

Kevin D. Bernstein, Esq.  
Albert G. McLean, Esq.  
SPICER RUDSTROM, PLLC  
119 s. Main Street, Suite 700  
Memphis, Tennessee 38103  
[kbernstein@spicerfirm.com](mailto:kbernstein@spicerfirm.com)  
[amclean@spicerfirm.com](mailto:amclean@spicerfirm.com)  
*Counsel for Defendant Sierra-Cedar, Inc.*

Robert A. McLean, Esq.  
Garrett M. Estep, Esq.  
FARRIS BOBANGO BRANAN, PLC  
999 S. Shad Grove Road, Suite 500  
Memphis, Tennessee 38120  
(901) 259-7100  
[rmclean@farris-law.com](mailto:rmclean@farris-law.com)  
[gestep@farris-law.com](mailto:gestep@farris-law.com)  
*Counsel for Defendant Tetrus Corp.*

Heather Gwinn Pabon, Esq.  
GORDON REES SCULLY MANSUKHANI  
222 Second Avenue South, Suite 1700  
Nashville, Tennessee 37210  
(615-772-9010)  
*Counsel for Defendant Sierra Systems Group, Inc.*

/s/Craig A. Edgington